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June 24, 2021

### Via ECF & email

The Honorable Katherine Polk Failla, U.S.D.J.

United States District Court

Southern District of New York

40 Foley Square

New York, New York 10007

Re: Butler v. Suria, 17-CV-03077 (KPF)

Dear Judge Failla:

This Firm represents the defendant Ravi Suria ("Mr. Suria"). This letter is being submitted to respectfully request that the Court grant the parties with a one-week extension to submit the joint Order appointing Avrum J. Rosen, Esq. ("Mr. Rosen") as the receiver and setting forth his terms and duties in liquidating the turnover assets to satisfy the judgment in this matter. The proposed Order is due today. One of the assets that Mr. Suria would be required to turnover pursuant to the proposed Order is a 2007 Tesla. Pursuant to the terms of the proposed Order, Mr. Suria would be required to transfer title to the Tesla within just ten days. Significantly, while Mr. Suria was of the belief that he had 100% title to the Tesla, it was brought to his attention this week that an investor group may have partial ownership of the Tesla. While this would not change Mr. Suria's obligation to turnover his interest in the Tesla, he (or Mr. Rosen) may need to arrange a resolution of the impediment to the title issue if Mr. Suria does not have 100% title to the Tesla. I requested that Mr. Suria be provided until next Tuesday, June 29, 2021, to obtain clarity as to this issue, because it may affect the specific language in the proposed Order. Mr. Butler's attorney has objected to the extension.

Accordingly, Mr. Suria respectfully requests that the parties be provided until July 1, 2021, to submit the proposed Order. I thank the Court for its consideration of this matter.

Respectfully submitted,

HOGAN & CASSELL, LLP



Michael Cassell

cc: Gabriel Bluestone, Esq. (via email & ECF)  
Avrum Rosen, Esq. (via email)

Application GRANTED.

Dated: June 24, 2021  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE